

**The United States District Court
For the District of Rhode Island**

United States Of America

Case No 1:23-cv-214-MSM-LDA

v

Judge Mary S.McElroy
Magistrate Judge Lincoln
D.Almond

Nellie Makarova Cross

January 20, 2024

REQUEST FOR PRODUCTION OF DOCUMENTS

INSTRUCTIONS

The Plaintiff is instructed to produce the originals of all offshore bank statements for years 2014,2015,2016,2017,2018,2019 within 30 days after the service of this request in accord with Fed.R.Civ.P.34 to be presented at oral deposition on 02/20/24.

If your response to this request is that the offshore bank statements for years 2014,2015,2016,2017,2018,2019 are not in your possession describe in detail the unsuccessful efforts you made to locate those records.

Respectfully,



Nellie Makarova Cross